

**United States Bankruptcy Court  
Western District of Pennsylvania**

|       |                                                                                                                        |           |                                                   |
|-------|------------------------------------------------------------------------------------------------------------------------|-----------|---------------------------------------------------|
| In re | <u>Randal L. Patterson<br/>a/ka Randal Leroy Patterson Jr.<br/>Kimberly J. Patterson<br/>aka Kimberly Jo Patterson</u> | Debtor(s) | Case No. <u>12-20009-GLT</u><br>Chapter <u>13</u> |
|-------|------------------------------------------------------------------------------------------------------------------------|-----------|---------------------------------------------------|

Christiana Trust et al c/o Selene Finance  
Movant,

v.

Randal L. Patterson  
Kimberly J. Patterson and  
Ronda J. Winnecour, Esq. Trustee  
Respondents.

**OBJECTION TO NOTICE OF MORTGAGE PAYMENT CHANGE**

And now this 30th day of January 2015 comes the Debtors by and through their Attorney Francis C. Sichko who sets forth the following:

- 1) Movant is seeking to change Debtors monthly mortgage payment from \$631.62 to \$2,085.16. Debtors present Ch 13 plan payment is \$1,027.00. As Debtors income is from Social Security any substantial increase would make it impossible to complete their plan.
- 2) The Trustee is holding a balance on hand of \$15,531.94 which is sufficient to cure prior mortgage payments and any increase in escrow. Movant or its predecessor Citimortgage is at fault for not having filed a transfer of claim after the Trustee made a payment of \$723.00 to Citimortgage on November 22, 2013. As such, the increase is not warranted.

Respectfully submitted,  
s/Francis C. Sichko  
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Date January 30, 2015

Signature /s/ Randal L. Patterson  
**Randal L. Patterson**  
Debtor

Date January 30, 2015

Signature /s/ Kimberly J. Patterson  
**Kimberly J. Patterson**  
Joint Debtor

Attorney /s/ Francis C. Sichko  
**Francis C. Sichko**